

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re SEPTEMBER 11 PROPERTY DAMAGE AND, 21 MC 101 (AKH)
BUSINESS LOSS LITIGATION

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This Document Relates to:

World Trade Center LLC et al. v.
United Airlines, Inc., et al.
08 Civ. 3719 (AKH)

NOTICE OF MOTION

World Trade Center LLC et al. v.
American Airlines, Inc., et al.
08 Civ. 3722 (AKH)

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PLEASE TAKE NOTICE, that upon the annexed Declaration of Michael E. Gorelick, dated August 19, 2010 (the "Gorelick Declaration"), the exhibits attached thereto, the Declaration of Charles G. Ehrlich, dated August 18, 2010, the exhibits attached thereto, and the accompanying Memorandum of Law dated August 19, 2010, and all prior pleadings and proceedings in the individual actions referenced above (the "Actions"), the undersigned, attorneys for Intervening Plaintiff TIG Insurance Company ("TIG"), as subrogee of World Trade Center Properties LLC, 1 World Trade Center LLC, 2 World Trade Center LLC, 3 World Trade Center LLC, 4 World Trade Center LLC, and 7 World Trade Company, LP, shall move before the Honorable Alvin K. Hellerstein, United States District Judge, United States District Court for the Southern District of New York, in Courtroom 14D of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, pursuant to Rule 24 of the Federal Rules of Civil Procedure for entry of an Order granting its motion pursuant to Rule 24 of the Federal Rules of Civil Procedure ("Fed R. Civ. P.") for leave to intervene as of right,

or, in the alternative, by permission of this Court, and file the proposed Complaints, copies of which are attached as Exhibits 1 and 2 to the Gorelick Declaration, and for such other relief as the Court deems just and proper.

Pursuant to Local Civil Rule 6.1(b), opposing papers, if any, shall be served within fourteen days after the service of these moving papers, and any reply papers shall be served within seven days after the service of such answering papers.

The motion will be heard on a date and at a time scheduled by the Court.

Dated: New York, New York
August 19, 2010

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JACOBSON, P.C.
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TIG Insurance Company, as subrogee of World
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By: 

Michael E. Gorelick (MEG-6026)